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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JESUS LOUIS VASQUEZ,  
  
Defendant.

CASE NO. 2:23-cr-00095-JAM-1

**STIPULATION AND ORDER TO CONTINUE  
FURTHER STATUS CONFERENCE AND  
EXCLUDE TIME UNDER SPEEDY TRIAL ACT**

DATE: January 21, 2025  
TIME: 9:00 a.m.  
COURT: Hon. John A. Mendez

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, Special Assistant United States Attorney Caily Nelson, and defendant, by and through defendant's counsel of record, Mark J. Reichel, hereby stipulate as follows:

1. By stipulation, the government and Jesus Vasquez, through counsel, Jennifer Mouzis, moved to continue the status conference until January 23, 2025, with an exclusion of time, under Local Code T4.

2. By previous order, this matter was advanced for status on January 21, 2025.

3. By previous order, Mark J. Reichel was appointed as counsel for Jesus Vasquez in place of Jennifer Mouzis on December 20, 2024.

4. By this stipulation, defendant now moves to continue the status conference until April 8, 2025, at 9:00 a.m. and to exclude time between January 21, 2025, and April 8, 2025, under Local Code

1 T4.

2 5. The parties agree and stipulate, and request that the Court find the following:

3 a) The discovery associated with this case includes over one hundred pages of  
4 reports, photos, and search warrant documents, as well as cellular phone downloads. All of this  
5 discovery has been either produced directly to counsel and/or made available for inspection and  
6 copying.

7 b) Counsel for defendant desires additional time to review the discovery with his  
8 client, research and investigate possible defenses, discuss any potential resolution with his client,  
9 research mitigating evidence, and present it to the prosecution. Mr. Reichel was recently  
10 appointed to this matter on December 20, 2024.

11 c) Counsel for defendant believes that failure to grant the above-requested  
12 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
13 into account the exercise of due diligence.

14 d) The government does not object to the continuance.

15 e) Based on the above-stated findings, the ends of justice served by continuing the  
16 case as requested outweigh the interest of the public and the defendant in a trial within the  
17 original date prescribed by the Speedy Trial Act.

18 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
19 et seq., within which trial must commence, the time period of January 21, 2025 to April 8, 2025,  
20 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
21 because it results from a continuance granted by the Court at defendant's request on the basis of  
22 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
23 of the public and the defendant in a speedy trial.

24 6. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
25 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
26 must commence.

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1  
2 Dated: January 14, 2025

MICHELE BECKWITH  
Acting United States Attorney

3  
4 /s/ CAILY NELSON  
CAILY NELSON  
Special Assistant United States  
Attorney

6  
7 Dated: January 14, 2025

/s/ MARK J. REICHEL  
MARK J. REICHEL  
Counsel for Defendant  
Jesus Louis Vasquez

**FINDINGS AND ORDER**

The Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court **VACATES** the January 21, 2025, **further status conference** and **RESETS** the matter for **April 08, 2025, at 9:00 a.m.** The Court also specifically finds that based on the facts set forth in the parties' stipulation, the failure to exclude the time between January 21, 2025, and April 8, 2025, would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court further finds that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. Time from January 21, 2025, to and including April 8, 2025, is excluded from the computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and Local Code T-4. With this stipulation, 0 of 70 days have been used against the computation of time within which a trial must commence.

IT IS SO ORDERED.

Dated: January 15, 2025

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE